

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

UNITED STATES OF AMERICA,)	
)	
)	
Plaintiff,)	Civ. No. 3:24-cv-712-HTW-ASH
v.)	
)	
)	
MISSISSIPPI STATE SENATE,)	
)	
Defendant.)	
)	

**PLAINTIFF UNITED STATES' UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT MISSISSIPPI STATE
SENATE' S MOTION TO STAY THE ENTIRETY OF THE PROCEEDINGS**

Plaintiff United States of America, by and through the undersigned attorneys, files this Unopposed Motion for Extension of Time to Respond to Defendant Mississippi State Senate's Motion to Stay the Entirety of the Proceedings.

The United States hereby asks for a 7-day extension of its current February 10, 2025 deadline for responding to Defendant's Motion to Stay, and further asks that the February 11 status conference regarding the Motion to Stay be postponed until after the United States' response is filed. Defendant does not oppose this motion. In support thereof, Plaintiff states:

1. On November 8, 2024, the United States filed a complaint (ECF No.1) with this Court against the Mississippi State Senate based on a charge of discrimination filed with the Equal Employment Opportunity Commission by Kristie Metcalfe. The complaint alleges Defendant discriminated against Metcalfe based on race (Black) during her eight years as a staff attorney for the Senate Legislative Services Office, in violation of Title VII.

2. The United States' response to Defendant's Motion to Stay is currently due on February 10, with a status conference scheduled for February 11.
3. By this motion, the United States asks for a 7-day extension of the time to file its response to Defendant's Motion to Stay. This would extend the United States' deadline from February 10 to February 17. The United States also asks that the status conference currently scheduled for February 11 be postponed until after the United States has filed its response to the Motion to Stay.
4. This is the United States' first request for an extension of time in this case. Defendant has previously been granted three extensions of time to file its response to the Complaint.
5. The United States asks for additional time in order to more fully review and evaluate Defendant's Motion to Stay before filing a response.
6. The United States' requested extension is made in good faith, would not unduly delay these proceedings, and would not cause prejudice to Defendant.
7. The requested extension will not impact the trial or trial schedule given no schedule has yet been set.
8. The United States' counsel has conferred with Defendant's counsel, who has stated Defendant does not oppose the United States' requested time extension or postponement of the status conference.
9. Due to the straightforward nature of its time extension motion, the United States requests the Court waive the requirement of a separate memorandum under Rule 7(b)(4) of the Local Uniform Civil Rules.

Based on the above, the United States respectfully requests that the Court grant a 7-day

extension of its current February 10 deadline for responding to Defendant Mississippi State Senate's Motion to Stay the Entirety of the Proceedings and postpone the February 11 status conference.

Date: February 7, 2025

Respectfully submitted,

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Chief

BY: /s/ Louis Whitsett

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